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10 Attorneys for Defendant
11 SYMANTEC CORPORATION

12
13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
15

16 DIGITAL REG OF TEXAS, LLC,

17 Plaintiff,

18 v.

19 ADOBE SYSTEMS INCORPORATED,
20 VALVE CORPORATION, ELECTRONIC
ARTS, INC., UBISOFT ENTERTAINMENT,
21 INC., SYMANTEC CORPORATION, INTUIT
INC., AVG TECHNOLOGIES USA, INC.,
22 ZYNGA GAME NETWORK INC., and
ZYNGA, INC.

23 Defendants.
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) Case No.: 4:12-cv-01971-CW (KAW)

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**DECLARATION OF JAMES
KAZANEGRAS IN SUPPORT OF
DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT
OF NONINFRINGEMENT BASED ON
DIGITAL REG'S LICENSE TO
MICROSOFT**

Honorable Claudia Wilken

**DECLARATION OF JAMES KAZANEGRAS IN SUPPORT OF DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT OF NONINFRINGEMENT**

I, James Kazanegras, declare as follows:

1. I am currently employed by Symantec Corporation ("Symantec") which is a defendant in the above-entitled action.

2. I worked at Symantec from 1991 until 1995 in technical support and quality assurance. I then left the company, but returned in 2003 as a software developer. Since returning to Symantec I have worked on the consumer licensing aspect of Symantec's Norton-branded products.

3. Symantec's Norton products protect customers' computers from computer viruses and other threats such as identity theft, and protect children from Internet dangers.

4. Generally, Symantec's Norton products run on Microsoft operating systems. Symantec developed a separate subset of Norton products that run on the Mac OS X operating system.

5. Symantec's Norton products also are designed to work with the Microsoft Internet Explorer web browser and other Microsoft products such as Outlook and Microsoft Messenger.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 12, 2013.

By: 

James Kazanegras